

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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**Tristan Taveras, on behalf of himself and others,
similarly situated in the proposed FLSA
Collective Action,**

Plaintiff,

v.

**Value Service & Repair Corp., Value Service
Corp., Yuval, Inc., Steven Bach, and Susan Bach,**

Defendants.

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Case No.: 22-cv-03416 (HG) (VMS)

**STIPULATED PROTECTIVE
ORDER**

WHEREAS, the parties in the above-captioned action have demanded and may demand production of certain records during the resolution discussions of this litigation;

WHEREAS, it is anticipated that certain documents would be regarded as proprietary and/or confidential by the parties; and

WHEREAS, in order to expedite the resolution process, the parties may agree to produce records for Settlement Purposes Only, yet, still provide a mechanism for protecting against misuse of confidential or propriety information; and

WHEREAS, Rule 26(c) of the Federal Rules of Civil Procedure provides for entry of a protective order such as is contained herein.

IT IS AGREED by and among the parties as follows:

1. This Order shall pertain to corporate, business and financial records, including, but not limited to, federal and state tax returns tax returns for Defendants, bank records for Defendants, records of any transfers of funds or property by the Defendants, and documents which show lines of credit that are accessible to Defendants.

2. With respect to pages of any document referred in paragraph 1 of this Order, such documents shall be designated as “confidential attorneys’ eyes only”, shall be treated as confidential, shall not be shared by Plaintiff’s counsel with Plaintiff and shall be used solely for the purposes of resolution efforts, and not for any other purpose.

4. In the event settlement efforts prove to be unsuccessful, the recipient of each confidential attorneys’ eyes only document, including all copies of each document and all excerpts or summaries of them, shall be returned to the party that produced them or, at the request of the producing party, destroyed.

Dated: February 10, 2023

AGREED:

For Plaintiff:

BY: /s/ Jason Mizrahi, Esq.
Jason Mizrahi, Esq.
Levin-Epstein & Associates, P.C.
60 East 42nd Street, Suite 4700
New York, NY 10165

For Defendants:

BY: Jamie S. Felsen, Esq.
Jamie S. Felsen, Esq.
MILMAN LABUDA LAW GROUP, PLLC
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042

SO ORDERED:

Vera M. Scanlon, U.S.M.J.